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14 UNITED STATES DISTRICT COURT
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 16 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

17 Goose Pond Ag, Inc.,
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 19 Plaintiff,
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 21 v.

22 Duarte Nursery, Inc., a California corporation;
 23 James Duarte, an individual; John Duarte, an
 24 individual; and DOES 1 through 25, inclusive,
 25
 26 Defendants.

Case No. 2:19-CV-02631-KJM-AC

**STIPULATION TO FURTHER EXTEND
 TIME TO RESPOND TO COMPLAINT;
 ORDER**

STIPULATION

Goose Pond Ag, Inc. ("Goose Pond") filed the complaint in this action on December 31, 2019.

Defendants Duarte Nursery, Inc., James Duarte, and John Duarte (together "Duarte Defendants") have been served personally or by substituted service, rather than by notice and acknowledgement.

Goose Pond and Duarte Defendants agreed to extend Duarte Defendants' deadline to respond to the complaint to February 20, 2020, and the court approved the extension of time by order entered January 31, 2020 (Doc. 11).

The parties now wish to agree to a further, brief extension of Duarte Defendants' deadline to respond to the complaint, to facilitate ongoing meet and confer discussions. Counsel for the parties have talked several times by telephone to meet and confer, and exchanged multiple emails with case authority and argument. Despite these diligent and good faith efforts, the parties need additional time to meet and confer on two issues raised by the allegations in Goose Pond's complaint.

To facilitate their ongoing discussions, the parties have stipulated to, and are requesting court approval of, a further two-week extension of time for Duarte Defendants to respond to the complaint. With the extension, Duarte Defendants' new deadline to respond to the complaint will be March 5, 2020. This deadline is appropriate given the length of the complaint and the parties' desire to continue their efforts to meet and confer on the pleadings. A status (pretrial scheduling) conference is currently scheduled for May 14, 2020. This extension will not affect that conference, or any other deadlines.

DATED: February 20, 2020

DOWNEY BRAND LLP

By: /s/ Robert P. Soran

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Goose Pond Ag, Inc.

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DATED: February 20, 2020

BRISCOE IVESTER & BAZEL LLP

By: /s/ Peter Prows
PETER PROWS
Attorneys for Defendants
Duarte Nursery, Inc., James Duarte, and John
Duarte

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ORDER

Defendants shall have until March 5, 2020 to respond to the complaint.

DATED: February 20, 2020.



CHIEF UNITED STATES DISTRICT JUDGE